IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

Preeti Kohli,)	C.A. No.: 2:23-cv-02090-RMG-KDW
)	
Plaintiff,)	
VS.)	
)	INTERROGATORIES ON MEDIATION
Medical University of South Carolina,)	
Ernest Benjamin Clyburn, MD, individually)	
and in his official capacity, and Ted A.)	
Meyer, MD, individually and in his official)	
capacity,)	
)	
Defendants.)	
)	

1. Would early mediation be useful in this case? If the answer is in the affirmative, when would you propose to conduct mediation in this matter?

ANSWER: No.

2. If early mediation is not thought to be useful, when is the earliest stage in which you believe it might be useful?

ANSWER: After key witnesses are deposed and documents exchanged.

3. Please provide the court with any additional information that would assist in setting a timeline for required mediation.

ANSWER: Parties believe, currently, this case will require engaging in some written and testimonial discovery before mediation.

[SIGNATURE PAGE FOLLOWS]

s/Bob J. Conley

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ATTORNEY FOR PLAINTIFF

Charleston, South Carolina October 2, 2023